

**HUGHES SOCOL PIERS RESNICK & DYM, LTD.**

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*Counsel to the School Districts*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**PURDUE PHARMA L.P., *et al.*,  
Debtors.<sup>1</sup>**

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**VERIFIED STATEMENT OF HUGHES SOCOL PIERS RESNICK & DYM, LTD. AND  
COCOUNSEL UNDER  
FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717), and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Pursuant to Federal Rule of Bankruptcy Rule 2019, Hughes, Socol, Piers, Resnick & Dym, Ltd. (“**HSPRD**”) makes the following verified representations for both itself and the attorneys and law firms identified in the signature block below with whom HSPRD is associated in these cases under the Bankruptcy Code (“**Cocounsel**”):

1. HSPRD and its Cocounsel represent The Board of Chicago School District No. 299, the other public school districts identified in **Exhibit A** hereto, and such other school districts as may subsequently join this action as parties (collectively, the “**School Districts**”), in their individual and representative capacities (and with the class members, collectively, the “**School District Class Claimants**”) in their claims and putative class actions pending in the United States District Court for the Northern District of Ohio as Case No. 1:19-op-46042-DAP, 1:19-op-45913-DAP, and No. 1:20-op-45281-DAP (the “**School District Class Action**”), which has been and remains stayed in connection with *In re National Prescription Opiate Litigation*, No. 1:17-md-2804 (N.D. Ohio) (the “**MDL**”).

2. The School District Class Action seeks to hold manufacturers and distributors of opioids, as well as pharmacies (collectively, the “**Opioid Defendants**”), liable for their role in creating the opioid epidemic. As a result, certain School Districts have asserted claims in one or more of the Debtors’ cases under the Bankruptcy Code on behalf of themselves individually and the School District Class Claimants.

3. None of the School Districts has any “disclosable economic interest” other than as disclosed in the preceding paragraphs.

4. HSPRD and Cocounsel currently represent ILWU-PMA Welfare Plan, which has filed a proof of claim in these proceedings. HSPRD and Cocounsel believe there is no conflict presented by representing School Districts and ILWU-PMA Welfare Plan.

5. Certain of cocounsel also represent entities also currently stayed in the MDL and who have filed proofs of claim in these proceedings. They are listed in **Exhibit B**. Cocounsel believes there is no conflict presented by representing School Districts and these entities.

6. Other than as disclosed herein, HSPRD and its Cocounsel do not currently represent or claim to represent any other entity with respect to any of the Debtors' cases under the Bankruptcy Code and do not hold any claim against or interest in any of the Debtors or any of the Debtors' estates.

7. The undersigned verifies that the foregoing is true and accurate to the best of counsel's knowledge, information and belief, and subject to the penalties for perjury provided for in 28 U.S.C. § 1746. HSPRD and its Cocounsel reserve the right to revise or supplement this verified statement as may be necessary or appropriate. This verified statement is provided without prejudice to the right of HSPRD, its Cocounsel and its clients to file any further statements, claims, adversary complaints, documents, notices, or pleadings in one or more of Debtors' cases under the Bankruptcy Code.

Dated: January 20, 2021

Respectfully submitted,

/s/ Matthew J. Piers

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*Counsel to the School Districts in their Individual  
Capacities and as Representatives of the Putative  
Class of the "School District Class Claimants"*